

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

In Re: ) CHAPTER 13  
Luis A. Quintana, Jr. ) CASE NO. 21-11436  
Debtor(s) ) JUDGE ARTHUR I. HARRIS  
              ) **MOTION TO MODIFY PLAN**  
              )

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Now comes the Debtor, by and through the undersigned counsel, and hereby moves this Honorable Court to modify this chapter 13 plan. Debtor's bankruptcy was filed on April 23 25, 2021 and the Chapter 13 plan and is pending confirmation.

The modified plan attempts to resolve both the Objection to Confirmation filed by First Guaranty Mortgage Corp. by providing for payment of \$19,500.89 in pre-petition mortgage arrears which is the amount listed in their proof of claim.

The proposed modified plan also values the secured claim of the Internal Revenue Service at \$0.00 in Part 3.2. Finally, the modified plan provides for treatment to Cupco, LLC in Part 3.4.

WHEREFORE, Debtor prays this motion will be granted, modifying the Chapter 13 plan.

Respectfully Submitted,

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Attorney for Debtor(s)

**CERTIFICATE OF SERVICE**

This is to certify that on July 12, 2021 a true and correct copy of the motion was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Lauren A. Helbling, at ch13trustee@ch13cleve.com,  
United States Trustee, at (Registered address)@usdoj.gov  
LeAnn E. Covey at [lcovey@clunkhoose.com](mailto:lcovey@clunkhoose.com)  
Nicholas R. Oleski at [nro@mccarthylebit.com](mailto:nro@mccarthylebit.com)

Debtor:

Luis A. Quintana, Jr.  
1917 West 41st Street  
Lorain, OH 44053

Creditors:

City of Lorain Utilities Department  
1106 W. 1st St.  
Lorain, OH 44052

Credit Acceptance  
P.O. Box 551888  
Southfield, MI 48037

Cup Co LLC  
c/o McCarthy Lebit Crystal & Liffman  
101 W Prospect Ave, Ste 1800  
Cleveland, OH 44115

Cupco, LLC c/o Nicholas Oleski, Esq.  
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Cleveland, OH 44114

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